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12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 GOOGLE LLC,

16 Plaintiff,

17 vs.

18 SONOS, INC.,

19 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN  
SUPPORT OF SONOS, INC.'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED (DKT. NO. 509)**

I, Jocelyn Ma, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. 509) filed in connection with its Opposition to Google’s Motions for Summary Judgment (“Opposition”) (Dkt. 508). If called as a witness, I could and would testify competently to the information contained herein.

3. Google seeks an order sealing the materials as listed below:

Document	Portions Sonos Sought to Be Filed Under Seal	Portions Google Seeks to Be Filed Under Seal	Designating Party
Sonos’s Opposition	Portions highlighted in green	Portions outlined in red boxes	Google
Exhibit E	Entire document	Portions outlined in red boxes	Google
Exhibit F	Entire document	Portions outlined in red boxes	Google
Exhibit G	Entire document	None	Google
Exhibit H	Entire document	None	Google
Exhibit J	Entire document	None	Google
Exhibit L	Entire document	Portions outlined in red boxes	Google
Exhibit M	Entire document	None	Google
Exhibit N	Entire document	Entire document	Google
Exhibit O	Entire document	None	Google

Exhibit P	Entire document	None	Google
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4. I understand that the Court analyzes sealing requests in connection with motions for summary judgment pursuant to the “compelling reasons” standard. *See, e.g., Edwards Lifesciences Corp. v. Meril Life Scis. Pvt. Ltd.*, No. 19-CV-06593-HSG, 2021 WL 5233129, at \*4 (N.D. Cal. Nov. 10, 2021); *Baird v. BlackRock Institutional Tr. Co., N.A.*, No. 17-CV-01892-HSG, 2021 WL 105619, at \*5 (N.D. Cal. Jan. 12, 2021).

5. The portions of Sonos’s Opposition and Exhibits E, F, and L and outlined in red boxes as well as Exhibit N contain references to Google’s confidential business information and trade secrets, including source code and details regarding the technical operation of Google’s products. The specifics of how these functionalities operate is confidential information that Google does not share publicly. Thus, I understand that the public disclosure of such information could lead to competitive harm to Google, as competitors could use these details regarding the architecture and functionality of Google’s products to gain a competitive advantage in the marketplace with respect to their competing products. Google has therefore designated this information as “HIGHLY CONFIDENTIAL—ATTORNEYS’ EYES ONLY” and/or “HIGHLY CONFIDENTIAL - SOURCE CODE – ATTORNEYS’ EYES ONLY” under the protective order (Dkt. No. 92). Although Sonos’s Administrative Motion sought to seal the portions of its Opposition highlighted in green and the entirety of Exhibits E, F, and L, Google only seeks to file under seal the portions of these documents outlined in red boxes. A less restrictive alternative than sealing would not be sufficient because the information sought to be sealed is Google’s confidential business information and trade secrets but has been utilized by the Sonos in support of its Opposition.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct. Executed on February 28, 2023, in San Francisco, California.

1 DATED: February 28, 2023

2 By: /s/ Jocelyn Ma

3 Jocelyn Ma

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